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From: Marsha Rule [marsha@reuphlaw.com]
Sent: Friday, October 26, 2007 10:50 AM
To: Filings@psc.state.fl.us
Cc: Diamond, Gregory; ORoark, Dulaney L (De); Lee Eng Tan
Subject: Docket 020960-TP
Attachments: Covad-Verizon Jt Motion for Extension 10-26-07.pdf

The full name, address, telephone number, and e-mail address of the person responsible for the electronic filing:

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The docket number and title of docket:

Docket No. 020960-TP
Petition for arbitration of open issues resulting from interconnection negotiations with Verizon Florida Inc. by DIECA Communications, Inc. d/b/a CoVad Communications Company

The name of the parties on whose behalf the document is filed:

Verizon Florida LLC and DIECA Communications, Inc. d/b/a Covad Communications Company

The total number of pages in the attached document: 3

A brief but complete description of each attached document.

Joint Motion for Extension of Time

Marsha Rule

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DOCUMENT NUMBER - DATE

09766 OCT 26 5

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Arbitration of open issues) Docket No. 020960-TP
resulting from interconnection negotiations) Filed: October 26, 2007
with Verizon Florida Inc. by DIECA)
Communications, Inc. d/b/a Covad)
Communications Company)
-----)

JOINT MOTION FOR EXTENSION OF TIME

Verizon Florida LLC ("Verizon") and DIECA Communications, Inc. d/b/a Covad Communications Company ("Covad") hereby jointly move that the Commission extend the time to file an interconnection agreement in this arbitration proceeding until November 30, 2007.

As stated in the parties' previous motions for extension of time, finalizing contract language has been a more comprehensive effort than expected because the parties have had to review previously agreed-upon language, incorporate language stemming from the Final Order on Arbitration, Order No. PSC-03-1139-FOF-TP issued on October 13, 2003, and incorporate TRO/TRRO related changes along with rulings on disputed TRO/TRRO amendment language issued in the Order on Arbitration in Docket No. 040156, Order PSC-06-0212-FOF-TP, released on March 15, 2006.

Verizon and Covad resolved the last remaining issue on October 23, 2007 and agreement has been reached on the terms of the parties' interconnection agreement. However, additional time is required to complete the administrative details associated with executing and delivering the interconnection agreement for Commission approval.

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

Verizon and Covad respectfully request that the Commission extend the time for filing their agreement until November 30, 2007. Because both parties join in this request, no party will be prejudiced by this extension.

WHEREFORE, for the foregoing reasons, Verizon and Covad respectfully request that the Commission extend the time for filing an executed, conforming amendment to November 30, 2007.

Respectfully submitted on October 26, 2007.

/s/ Dulaney L. O'Roark III

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/s/ Marsha E. Rule

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Attorneys for DIECA Communications, Inc.
d/b/a Covad Communications Company

CERTIFICATE OF SERVICE

Docket 020960-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by email and U.S. Mail to the following parties on this 26th day of October, 2007 to:

Theresa Tan, Esq.
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

/s/ Marsha E. Rule

Marsha E. Rule